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COLUMBIA RIVER CONSERVATION LEAGUE

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1942 Hetrick Ave.
Richland, WA 99352

June 3, 1999

Mr. Tom Ferns
USDOE, Richland Operations Office
P. O. Box 550, MSIN H0-12
Richland, WA 99352**RECEIVED**

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DOE-RL / DIS

RE: Comments in support of Alternative Two of the Revised Draft Hanford Remedial Action Environmental Impact Statement and Comprehensive Land Use Plan.

Dear Mr. Ferns:

Thank you for the opportunity to comment on the Revised Draft Hanford Remedial Action Environmental Impact Statement and Comprehensive Land Use Plan (HRA-EIS). We are pleased the U. S. Department of Energy (USDOE) has recognized the irreplaceable ecological values of the Wahluke Slope and the Hanford Reach of the Columbia River in their Preferred Alternative within the HRA-EIS by designating them for preservation. The attached page documents the sustained public support for preservation of the Wahluke Slope as national wildlife refuge and the Hanford Reach as a Wild & Scenic River has enjoyed since issuance of the Hanford Reach of the Columbia River EIS in June of 1994. However, the Preferred Alternative fails to recognize the considerable biological resources of the central Hanford Site. The Industrial, Conservation, Research and Development, and Recreation areas depicted in the Preferred Alternative are not based on studies, data, or demonstrated need. Rather they are presumptive and speculative and therefore not appropriate for recommendation in a NEPA document such as the HRA-EIS. For these reasons, and for preservation of the unique biological resources of the Hanford Site, the Columbia River Conservation League endorses Alternative Two in the HRA-EIS. Alternative Two is supported by studies, demonstrated need, or existing use as follows:

The Industrial areas depicted in Alternative Two reflect the City of Richland's Urban Expansion Area per its comprehensive planning under the State of Washington's Growth Management Act. The two other Industrial areas depicted in Alternative Two include the existing operations at the Fast Flux Test Facility and the Washington Public Power Supply System. Therefore we concur with the recommendation for industrial areas as depicted in Alternative Two. The Recreational Areas in Alternative Two depict a high intensity recreational area for a museum at the B-Reactor. We concur that the B-Reactor is of unique historical value, but recommend this museum facility be limited to the area within the existing B-Reactor security fence line with access restricted to existing paved roads only. A low intensity recreation area should be developed as an improved boat launch at the existing Vernita Rest Stop facility in coordination with the existing rest stop facilities located on the south side of the river at the Vernita Bridge. Research and Development should be limited to the existing footprint of the LIGO. Industrial Exclusive areas should be limited to the area depicted in Alternative Two. The rest of the Hanford Site should be designated Preservation as recommended in Alternative Two. Preservation designation is consistent with the Washington State Fish & Wildlife's Priority Species maps and Priority Habitat maps within the HRA-EIS and would protect the biological resources identified by The Nature Conservancy's biological survey for the USDOE which so far has identified 42 species new to science throughout the Hanford Site.

Regardless of the alternative selected by the USDOE in its final HRA-EIS the Columbia River Conservation League recommends the following:

- Designate all lands within the Arid Lands Ecology Reserve, Wahluke Slope, the islands of the Hanford Reach, and Riverlands/McGee Ranch area as a national wildlife refuge overlain by the Hanford Reach Recreational, Wild & Scenic River. All these areas to be managed by the U. S. Fish and Wildlife Service.
- Issue a Record of Decision before the end of calendar year 1999 for the areas listed in the bullet above. This may be an interim or separate Record of Decision from that for the central Hanford Site if the issues concerning central Hanford are too complex or if comment periods are extended for the HRA-EIS.
- All mining should be restricted to those mineral resources necessary to support Hanford cleanup activities and should occur only in areas of low biological integrity. Mining on the Hanford Site should occur only after an environmental review per NEPA and as a non-conforming use if within preservation areas.
- Agriculture and grazing should not occur on any Hanford Site lands.
- No Industrial, High Intensity Recreational, or Research & Development areas should be designated within ¼ mile of the Columbia River except at the 300 Area as depicted in Alternative Two.
- Any trails constructed along the Hanford Reach or within the Hanford Site should be foot traffic only with no motorized vehicle use. Such trails must be located away from sensitive wildlife habitat and avoid riparian areas.

We look forward to issuance of the final HRA-EIS and will continue to support preservation of the Hanford Site's unique natural legacy and preservation of the Hanford Reach of the Columbia River while providing for reasonable economic development of Hanford lands.

Sincerely,


Bob Wilson

**SUMMARY OF PUBLIC SUPPORT
FOR
DESIGNATING THE WAHLUKE SLOPE AS NATIONAL WILDLIFE REFUGE
AND
DESIGNATING THE HANFORD REACH AS RECREATIONAL
WILD AND SCENIC RIVER**

1. From January 1994 through May 1999, the Mid-Columbia Basin's regional newspaper, The Tri-City Herald, has published **283** Letters to the Editor specific to the Hanford Reach. **215 of these letters (76%) support federal Wild & Scenic River designation for the Reach.**
2. A 1995 independent and scientifically-conducted poll by Eiland Research, Seattle, WA revealed that **76%** of the residents of the counties surrounding the Reach **support federal Wild & Scenic River designation for the Reach and National Wildlife Refuge designation for the Wahluke Slope.**
3. A 1996 survey of residents of the counties surrounding the Reach by Benton County's own Planning Department revealed the **most desirable land use and management authority for both the Hanford Reach and the Wahluke Slope to be wildlife and fisheries management under federal authority and the least desirable managers to be private or local authorities.**
4. **Two of the three Tri-Cities**, Richland and Kennewick, **support federal Wild & Scenic** designation for the Hanford Reach with the City of Pasco remaining neutral on the issue.
5. Of the **535** letters received by the National Park Service while completing the Final Environmental Impact Statement for the Hanford Reach, **464 comment letters, (87%) supported federal Wild & Scenic River designation for the Reach and National Wildlife Refuge designation for the Wahluke Slope.**
6. The Committee to Save the Reach has received over nine hundred written endorsements signed by over two thousand individuals for designation of the Hanford Reach as Wild & Scenic and Wahluke Slope as national wildlife refuge from businesses, community organizations, and citizens throughout the state of Washington.
7. The Committee to Save the Reach issues a newsletter to over 2,000 Mid-Columbia Basin Wild & Scenic Reach supporters.
8. The editorial boards of all major regional newspapers support Wild & Scenic designation for the Reach as do the governors of Oregon, Washington, and Alaska, the Northwest Power Planning Council, and the majority of Washington State's Congressional delegation to the 106th Congress.